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**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF WYOMING**

ESTATE OF RUSSELL MONACO, BY	)	
AND THROUGH KATHY MONACO,	)	
WRONGFUL DEATH REPRESENTATIVE	)	
AND PERSONAL REPRESENTATIVE,	)	
AND KATHY MONACO, INDIVIDUALLY	)	
AND ON BEHALF OF MINOR	)	
CHILDREN,	)	
	)	
Plaintiffs,	)	Case No.: 13-CV-151S
	)	
vs.	)	
	)	
HARLEY G. MORRELL, PA-C, JOHN	)	
SCHNEIDER, JR., M.D., NORTHERN	)	
ROCKIES NEURO-SPINE, P.C., a Wyoming	)	
Corporation, WEST PARK HOSPITAL	)	
DISTRICT, WEST PARK HOSPITAL,	)	
QUORUM HEALTH RESOURCES, LLC, a	)	
Delaware Corporation, AND JOHN DOES 1	)	
THROUGH 10	)	
Defendants.	)	

**DEFENDANTS JOHN H. SCHNEIDER M.D. AND NORTHERN ROCKIES NEURO-SPINE,  
P.C. MOTION FOR EXTENSION OF TIME TO RESPOND TO  
THE JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT**

Defendants John H. Schneider M.D. and Northern Rockies Neuro-Spine, P.C., by and through its attorney, Stephenson D. Emery of Williams, Porter, Day & Neville, P.C., hereby move this Court for an Order extending these Defendants’ time within which to respond the *Joint Motion for Entry of Consent Judgment*. As grounds for this Motion, these Defendants state as follows:

1. Defendants were served with the *Joint Motion for Entry of Consent Judgment* on March 4, 2014.

2. Defendant's Response to the Joint Motion is currently due on March 18, 2014.

3. Counsel requires additional time to respond and requests a two-week extension to file its Response, which would extend the current deadline to April 1, 2014.

4. The additional time will not prejudice or unnecessarily delay the proceedings.

5. The undersigned has conferred with counsel for the plaintiffs and other defendants regarding an extension of time to file these Defendants' Response. Counsel has stated that they have no objection to extending defendants' deadline to April 1, 2014.

**WHEREFORE**, Defendants John H. Schneider M.D. and Northern Rockies Neuro-Spine, P.C., respectfully request this Court to grant Defendants an extension of time up to and including April 1, 2014 to file its response to the *Joint Motion for Entry of Consent Judgment*.

Dated this 14<sup>th</sup> day of March, 2014.

JOHN H. SCHNEIDER and NORTHERN  
ROCKIES NEURO-SPINE P.C.  
Defendants.

/S/ Stephenson D. Emery  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the *Motion for Extension of Time to Respond to Joint Motion for Entry of Consent Judgment* in Civil Action No. 13-CV-151S was electronically filed, using the electronic filing system. The system will send notification of such filing to the registered CM/ECF user at their email addresses.

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